Presentation to FCC

Agenda

- Introductions
- Use and Promotion of QR Codes
- Uses of QR Codes by Manufacturers
- Asks

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Introductions

- Mobile & Wireless Forum (MWF)
  - The MWF is an international association of telecommunications equipment manufacturers focused on regulations for certification of mobile and wireless communications, including the evolution to 5G and the Internet of Things. Originally established to address issues related to the health and safety of radio frequency electromagnetic fields, the MWF now addresses a range of regulatory compliance matters.
- Information Technology Industry Council (ITI)
  - The premier global advocate for technology, representing the world's most innovative companies. Founded in 1916, ITI is an international trade association with a team of professionals on four continents. We promote public policies and industry standards that advance competition and innovation worldwide. Our diverse membership and expert staff provide policymakers the broadest perspective and thought leadership from technology, hardware, software, services, and related industries.

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Use and Promotion of QR Codes

- MWF and ITI position on the use of QR codes, which:
  - Are ubiquitous and well understood.
  - Allow for targeted and detailed explanations for consumers.
  - Should be preferred over written material that currently. accompanies products.
  - Should be preferred over current product labeling practices.
- FCC has adopted a similar position on use of QR codes for device security and in the HAC R&O.
  - FCC's promotion of QR code use for security is in line with increased QR code use by consumers and manufacturers.
  - FCC's language in the HAC R&O clearly approves of QR codes but imposes unnecessary limits on their use for packages.
- Our position is that FCC should endorse expanded use of QR codes.

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Uses of QR Codes by Manufacturers

- Three Areas for QR Code Use:
  - Packaging
  - Inside materials – e.g., user manual, quick start guide
  - Device itself
- All areas are ripe for QR code use
  - Use on a device will remediate problems with small text on a device and assist where products are too small to add language.
  - Use on packaging will assist in providing clear messages and avoid confusing information.
- Current FCC Authorization:
  - In the recent HAC R&O, FCC authorized QR code use for inside materials but not on packaging. For inside materials, the benefits of QR codes were clearly explained.
  - The device was not referenced.

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Asks

- Allow the use of QR codes without superfluous URLs for external labeling across all programs, including HAC;
- Clarify when labels must appear on external versus internal packaging to avoid conflicting interpretations;
- Eliminate or reduce mandatory printed language that duplicates information accessible through QR codes, especially when such language may reduce label legibility;
- Encourage use of QR codes that lead to centralized, multilingual product compliance resources—consistent with ITI's e-labeling recommendations and international standards such as ISO/IEC 22603-1 and 22603-2.
- Streamline required regulatory language for readability and consistency with current technologies and engineering practices. Rule 15.105(b) provides a good example.

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Reminder of Benefits of QR Codes

Environmental Benefits

207,360 Trees
Based on 15.36 trees per metric Ton

13,500 Mt
10gms of paper per box, 1.35 Billion smart phones globally

Eliminating Unnecessary Paper
Preventing waste entering the recycling loop

Business Benefits

SKU Reduction
Significantly reduces Stock keeping units,

Resource impact
Less rework/excess/obsolete stocks to manage

Transport Benefits
Less weight in transportation

Transition to New Laws Quicker
Reflecting legislation changes digitally

Accessibility Benefits

Magnifier and Zoom functionality

Colors
People with Color blindness or differentiation issues can view as per their settings on their device

Speak Selection

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